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Mr. Jim Pardee
2419 Swanfield Court
Thousand Oaks, CA 91361

RE: Results of a Biological Resources Field Survey and Cumulative Impacts Analysis for the West Lilac Farms I & II Tentative Map Project Site, TM 5276, Valley Center

Dear Mr. Pardee:

This brief letter presents the results of a biological resource field survey of the proposed West Lilac Farms I & II Tentative Map Project Site, TM 5276. The subject project involves an approximately 92.78-acre property supporting nearly 100 percent active agricultural land situated south of Lilac Road and northeasterly of Via Ararat Drive and Mt. Ararat Way in the Valley Center Community Planning Area of unincorporated San Diego County. Approval of TM 5276 project would result in the creation of 28 residential parcels lots, with access provided from the east off Aqueduct Road and from the west off Via Ararat Drive.

SITE DESCRIPTION

The subject project site consists of two adjoining parcels that make contact at a 45-degree angle, as shown on the Vicinity Map on the attached 100'-scale Vegetation Exhibit. The southwesterly parcel is more-or-less square, and the northeasterly parcel is irregularly rectangular. Both parcels support agricultural lands (orchards). Elevations onsite vary between approximately 680 and 885 feet MSL. The southwesterly parcel slopes gently to the south and west, and the northeasterly parcel to the north and west. Drainages are found adjacent to lots #1-#5, and to the northeast of lot #16. These support riparian vegetation. The vast majority of the remaining areas of the site was planted with orchard trees many years ago, and is in active agricultural production.

METHODS

A biological survey of this property was completed by Ms. Shannon M. Allen, Biological Consultant, on the afternoon of August 8th 2001 between the hours of approximately 14:00 and 16:00. Weather conditions

were conducive to field surveying, with moderate temperatures (80°s F), clear skies, and a light northerly breeze. The entire property was walked, and all plants, animals, and habitats encountered were identified in the field. A directed Stephen's Kangaroo Rat Habitat Evaluation was completed, as were directed searches for other sensitive species known from the vicinity. Drainage areas were examined for the presence of RPO and jurisdictional (ACOE, CDFG, CRWQCB) wetland indicators, and all onsite vegetation and adjoining offsite vegetation was mapped. The onsite and adjoining offsite vegetation communities were delineated using a 200'-scale aerial photograph and a 100'-scale topographic map of the property. All collected data are utilized in the analysis of project impacts for this report.

RESULTS

Plant Communities

Five plant communities are associated with the Lilac Tentative Map Project Site. These include the following:

Orchards and Vineyards (Holland Code #18100) - 76.00 acres

The vast majority of the Lilac property supports an active orchard. This habitat is indicated by Avocado (*Persea americana*), Orange (*Citrus sinensis*), and Lemon (*Citrus limon*) groves, with occasional orchard weeds such as Scarlet Pimpernel (*Anagallis arvensis*), Common Horseweed (*Conyza* sp.), and others in the understory beneath the trees. This habitat-type is of no local or regional significant biological resource value.

Southern Coast Live Oak Riparian Forest (Holland Code #61310) - 0.22 acres

A small area of mature riparian forest vegetation is present on the edge of the northeastern corner of proposed parcel #16. This area is connected to a larger drainage system supporting Southern Coast Live Oak Riparian Forest. This drainage skirts the northeastern edge of the parcel and continues offsite in a northwest direction. Indicators in the riparian forest habitat include Coast Live Oaks (*Quercus agrifolia*) and Willows (*Salix* spp.) scattered throughout the drainage. This habitat qualifies as a jurisdictional wetlands habitat. Impacts to this habitat would be regulated by the County pursuant to the RPO, by the California Department of Fish and Game, by the U.S. Army Corps of Engineers, and by the California Regional Water Quality Control Board. These agencies are concerned with losses of habitat, primarily as a result of discharge, dredging, or filling of wetlands. The Clean Water Act (CWA), enacted in 1972, controls discharge of pollutants into the surface water system and established the National Pollution Discharge Elimination System. CWA was amended in 2002 to require Storm Water Pollution Prevention Plans for new construction sites over 1 acre and for industrial sites whose activities may cause contamination to runoff the site into storm water drainage systems. The California version of CWA is the Porter-Cologne Act, which established the State Water Resources Control Board and the Regional Water

Quality Control Boards to oversee use and protection of the “Waters of the State”. In California, all surface waters and groundwater are considered to be “Waters of the State”. The canopies of Southern Coast Live Oak Riparian Forest habitats are used by avifauna and other wildlife as biological linkage corridors. Wildlife also uses the understory to traverse open areas. For these reasons, the Southern Coast Live Oak Riparian Forest functions as a wildlife corridor in association with the project site. This habitat-type is of recognized local and regional biological significance.

Disturbed Wetland (Holland Code #11200) - 1.85 acres

A disturbed drainage traverses the property in the northwest portion of proposed parcels #1 through #5. The drainage has been cleared of woody vegetation, leaving herbaceous hydrophytes as the dominant cover. Grove activities are present on either side of the drainage and flowing water was present at the time of the survey due to grove irrigation runoff. Indicators in the Disturbed Wetland include Wild Heliotrope (*Heliotropium curvassavicum*), California Dock (*Rumex salicifolius*), Sedge (*Cyperus* sp.) and other low-growing species. This habitat qualifies as jurisdictional wetlands. Various other drainage features are present onsite. However, none of these supports any wetland indicators, and all are basically just erosion ditches associated with the grove. One drainage feature is located nearly perpendicular to the Disturbed Wetland north of the proposed pad for Parcel 2. This feature supports a large steel pipe imbedded within the drainage. Within the Disturbed Wetland, there are various plastic pipes and other similar materials associated with grove activities. These are short makeshift pipes used to drain the orchard access dirt road. Many of these pipes no longer function (silted in) – they will be left in place following development, as removing them could create an erosion problem.

Non-Native Grassland (Holland Code #42200) - 14.71 acres

Active groves are not present in the area of proposed lots #20, #21 and #22. Non-native grasses have become the dominants in this area, as well as in a small patch near proposed lot #19. Indicators include Rip-gut Brome (*Bromus diandrus*) Soft Brome (*Bromus mollis*), Perennial Mustard (*Brassica geniculata*), Purple False Brome (*Brachypodium distachyon*) and other weedy upland species.

Urban/Developed habitat (Holland Code #12000) - offsite

Development is present onsite in the form of roads, and offsite in several areas surrounding the property. Several homes are present offsite in association with the grove areas adjoining the property. Two paved roads surround the property boundary; Via Ararat forms the western property boundary near proposed lots #6, #7, and #8, and Mount Ararat forms the southern boundary near proposed lots #1, #5, and #6.

Flora/Fauna

A total of fifty-five species of plants and twelve species of animals were detected in association with the

TM 5276 project site. These represent species common in this part of San Diego County, most associated with disturbed areas, riparian wetlands, or groves. All of the plants and animals detected on the property are locally-common species, and no “listed” species or “narrow endemics” are expected to be dependent on this site. One wide-ranging sensitive species was detected (Turkey Vulture) – this is discussed sub-sequently. A list of the flora and fauna associated with the TM 5276 property is presented in Table 1.

Sensitive Habitats

Two of the five plant communities found in association with TM 5276 (Southern Coast Live Oak Riparian Forest and Disturbed Wetlands) are considered sensitive in the County, pursuant to CEQA and the Resource Protection Ordinance (RPO). Specific mitigation for project-related impacts to these habitats is recommended. This consists of biological open space and fire-clearing setbacks from the outer edge of the habitats. This is discussed subsequently.

Sensitive Species

No sensitive plants were detected on the TM 5276 project site. Given the disturbed nature of the vast majority of the property, none are anticipated. Sensitive plant species known to occur in the general vicinity of this property are listed in Attachment B.

One sensitive animal species was detected during the site survey:

Turkey Vulture (*Cathartes aura*)

Turkey Vulture is an unmistakable, large soaring scavenger. This distinctive species remains common in the interior of San Diego County, particularly in agricultural areas, where the birds gather to feed on dead animals. Turkey Vulture is federally protected under the Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act. This species is of some interest in San Diego County, as numbers decline as a result of the conversion from an agrarian to an urban society.

A single mature Turkey Vulture was observed flying across the edge of the property during the site survey. Nesting habitat is not present onsite or nearby, nor does the site constitute a significant foraging or roosting area for this large bird.

Stephen's Kangaroo Rat Habitat Evaluation

Stephen's Kangaroo Rat (*Dipodomys stephensi*) is a State and Federally-listed "Threatened Species", subject to protection under both the Federal and State Endangered Species Acts (CESA, FESA). This secretive, nocturnal mammal is not specifically known to occur in Valley Center, although specimens are

known from the San Luis Rey River to the west, from the Ramona Valley to the south, and from the Fallbrook Naval Weapons Facility to the northwest. All of these known populations are many miles from the TM 5276 site. *D. stephensi* occurs in open habitats dominated by low forbs such as Red-stem Filaree (*Erodium cicutarium*) with scattered, low perennial shrubs, including Flat-top Buckwheat (*Eriogonum fasciculatum*), California Sagebrush (*Artemisia californica*), and others. Ideal habitat is characterized by the presence of friable, loamy soils where the rats can construct underground burrows, and extensive open areas between shrubs for foraging, breeding, etc. Apparently not tolerated is the presence of dense brush or a heavy thatch of annual weedy grasses. Also not tolerated is the presence of nearby development, as this species suffers extirpation in the presence of feral pets and other "edge effects". Moore-Craig (1984), working at the San Jacinto Wildlife Area, reported that successful trapping sites for SKR had an average of only 9.1 percent vegetative cover.

Surveying for this completely nocturnal species involved searching the site for characteristic scats, diggings, and burrows. This was completed as a part of the baseline biology survey of the property. Numerous California Ground Squirrel (*Spermophilus beecheyi*) and Valley Pocket Gopher (*Thomomys bottae*) burrows were seen, and other small rodents probably occur onsite (*Peromyscus*, others). No signs of *Dipodomys* were detected. The open grassland areas on the TM 5276 site have an average cover of at least 80%, many times more dense than is tolerated by SKR. In Non-native Grassland, occurrence and relative abundance of SKR is directly related to the proportion of annual forbs to annual grasses. Annual forbs provide critical greens in the spring, furnish temporary cover, produce many large seeds, then dry and disarticulate rapidly, creating patches of preferred open ground. Annual grasses, on the other hand, tend to persist for years, forming dense mats of dead materials presumably impeding ease of SKR movement (O'Farrell and Uptain, 1989).

Because *Dipodomys* does not appear to occur on the TM 5276 project site, the likelihood that *D. stephensi* is a resident species is considered extremely low, and recruitment is considered unlikely. Given the surrounding land-use (orchards), dense thatch of non-native grasses in the grassy areas, and distance to known populations, the TM 5195 project site is considered unoccupied by SKR.

IMPACTS

Approval of the TM 5276 project and the development of the property, as presently proposed, will result in both direct and indirect impacts to biotic resources found on and in association with this site. As required by the CEQA, a "worst-case" scenario is always examined when determining potential project-related impacts. Impacts are assessed at a level which is either "significant" or "less than significant" under provisions of CEQA. Also, an assessment is made as to whether or not those project-related impacts determined to be significant are fully mitigable, reducing their effects to less than significant. In this

instance, all anticipated impacts are considered mitigable within the context of an appropriately-conditioned project approval.

The following potential project-related impacts have been identified in association with the TM 5276 project:

- (1) Direct and indirect losses (grading, fire clearing, etc.) affecting up to approximately 76 acres of Orchards and Groves vegetation and up to 14.71 acres of Non-native Grassland. This impact would be at a level that is considered **less than significant**. These unnatural community associations are of little to no regional biological value. However, DPLU Staff has determined that this impact is **significant**, as defined by CEQA. Therefore, mitigation will be required.
- (2) Direct and indirect losses (grading, fire clearing, etc.) affecting up to approximately 1.85 acres of Disturbed Wetland and 0.22 acres of Southern Coast Live Oak Riparian Forest vegetation. Any measurable impacts to these sensitive communities would be at a level that is considered **significant**.
- (3) All other project impacts are considered **less than significant**. These include losses of disturbed/developed habitat and edge effects (noise, lighting, etc) potentially impacting adjoining properties. Areas adjoining the proposed development portions of this site are currently developed, or in similar grove operations, hence edge effects are minimal.

Street "E", as proposed, will be placed over a dirt road that has been used for some time to access the existing orchards. This road qualifies as Urban/Developed Habitat. Improvements to Street "E" in the existing road footprint will not involve any new impacts to wetlands. As previously discussed, the adjoining drainage qualifies as jurisdictional wetlands. Although grading is shown at the point where the drainage meets the proposed street improvements, the current width of the dirt road, the proposed improvements, the future road setback, and any types of rails or walls between the road and the drainage will occur entirely within the Urban/Developed Habitat of the existing dirt road. Walking trails are not proposed, and no other improvements that could extend into the drainage are proposed. The construction of Street "E" will thus not impact wetlands.

An earlier project design contained certain utility trenches and water mains that cross through the proposed biological open space (see below). These have been relocated, and no improvements (e.g.: water mains) will enter the proposed easement. A graphic showing these improvements has been provided by the project Civil Engineer.

The Stormwater Management Plan proposes the use of bio-filters to manage project stormwater runoff. While bio-filtration may be suitable to this project, the onsite wetland areas may not act as bio-filters in any way for project runoff. No rip-rap, culverts, outfall pipes, landscaping or other stormwater facilities will be allowed within the proposed biological open space easements. No efforts to minimize habitat within the easements is permitted. Any maintenance activities in these areas would be in violation of the proposed open space, and would further trigger the need for various state and federal permits. Wetlands in open space are to be kept in their natural state.

CUMULATIVE IMPACTS ANALYSIS

The County of San Diego Department of Planning and Land Use has initiated a new requirement under CEQA to complete a cumulative biological impacts analysis for many current projects. In a letter dated 10 August 2004, Staff requested that the TM 5276 project provide such an analysis in order to ensure that the project will not result in any significant, unmitigated impacts to biological resources.

According to Section 15130(a) of the State CEQA Guidelines, cumulative impacts must be discussed when project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. As described previously in this report, the majority of the TM 5276 project site is used for agriculture in the form of groves and agricultural roads of little to no biological value. The approximately 17 acres of remaining land onsite are also mostly non-native habitats (Disturbed Wetland and NNG) with a very small patch of Southern Coast Live Oak Riparian Forest at the periphery of the site.

As part of the proposed TM 5276 project, 28 new residential lots would be created, with access provided from the east off Aqueduct Road and from the west off Via Ararat Drive. These improvements, including brush management, will result in impacts to approximately 13.39 acres of NNG

If the TM 5276 project was not approved, direct impacts to 13.39 acres of NNG could be avoided, and no incremental (albeit minor) contribution to the regional cumulative resource loss would be realized. However, **indirect** impacts would still continue to degrade the habitat as a result of “edge effects”. This is due to the fact that this site is entirely surrounded by rural residential development or similar agriculture. These indirect impacts would result from continued agriculture use of the site, domestic animals moving through the habitat, etc. The weedy grassland could be restored to groves via the planting of new grove trees under the existing agricultural permit, thus eliminating this resource in any case. Although build-out of all near-term projects would clearly result in cumulative biological impacts, the limited acreage of NNG associated with this site when viewed in the context of past projects, other current projects, and probable

future projects would limit impacts from a regional perspective. Therefore cumulative impacts associated with TM 5276 are considered “less than significant”.

The following findings relate to the TM 5276 project’s contribution to the regional cumulative resource loss:

1. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

RESPONSE: The TM 5276 project will not have any substantial adverse effect on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Although one sensitive species (Turkey Vulture) was observed soaring over the property, the effects of project implementation on this species is negligible, with full “habitat based” mitigation being provided in compliance with County, state, and federal policy.

2. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

RESPONSE: The TM 5276 project will not have any substantial adverse effect on any riparian habitat. All riparian habitat associated with this site will be avoided by design, and placed into conserved biological open space. The project will have an adverse but minor effect on one upland habitat: Non-native Grassland. Offsite mitigation will be provided to adequately compensate for the adverse effect of site development.

3. *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal filling, hydrological interruption, or other means?*

RESPONSE: The TM 5276 project does not support any federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no federal wetland impacts will be realized.

4. *Would the project conflict with any local policies or ordinances protecting biological resources?*

RESPONSE: The TM 5276 project does not conflict with any local policies or ordinances protecting biological resources. Any project impacts that result in a loss of biological resource values will be mitigated for in full compliance with the County’s Resource Protection Ordinance, the Habitat Loss Permit ordinance, and any other relevant policies or ordinances relating to biological resources.

5. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

RESPONSE: The TM 5276 project does not conflict with any provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans. The County is currently preparing a Subarea NCCP plan for the area surrounding and including this property. This plan does not identify the TM 5276 project site as being subject to habitat conservation. The proposed development of this site will therefore be in full compliance with this or any other future habitat conservation plan insofar as all project impacts are mitigated to the full extent feasible.

6. *Does the project have impacts that are individually limited, but cumulatively considerable?*

RESPONSE: The TM 5276 project does not have impacts that are individually limited, but cumulatively considerable. This is because all impacts are relatively minor, and fully mitigated offsite in compliance with County policy, CEQA, and the Resource Protection Ordinance.

MITIGATION

In order to reduce all potential project-related impacts associated with future site development to **Less than Significant**, as defined by CEQA, it is recommended that portions of the site be placed into biological open space. The biological easement area will need to be buffered from development through the dedication of a fire-clearing buffer easement of no less than 100-feet to prevent encroachment into the biological open space easement area. The proposed open space easement area has measurable habitat value for two reasons: (1) it provides a wildlife corridor connecting offsite properties, and (2) it supports jurisdictional and RPO wetlands, which support riparian habitat. The precise limits of the proposed biological open space easement and fire clearing easement are shown on Attachment A.

Although potential impacts to up to 14.71 acres of Non-native Grassland are determined to be **Less than Significant**, County Staff has determined that mitigation at a ½ to one ratio is required for impacts to this non-natural habitat-type. A portion of this vegetation, totaling 1.32 acres, will be actually conserved within the 100-foot wetland buffer on proposed lot #16. This amount will neither be impacted nor used for mitigation; rather, it will just be preserved as a buffer to the wetland area. Therefore, the applicant shall purchase no less than 6.70 acres of Non-native Grassland mitigation credits (14.71 acres – 1.32 acres X 0.5) in a County-approved Mitigation Bank offering such credits, or in another County-approved location.

Some of the proposed pads are located within 100 feet of the property line. These are on proposed lots #1, #8, #11, #12, #13, #16, #26, and #27. In the case of lots #1, #8, #11, #12, #13, and #26, these adjoin habitat that does not require fire clearing (such as groves or offsite residences). In the case of proposed

lots #16 and #27), they contain a 100-foot setback from the property line to keep any required fire clearing on the property and avoid the need for offsite clearing.

I hope that this information will be appropriate for your needs. Please contact me should you need further information or clarification.

Sincerely,



Vincent N. Scheidt, MA
Certified Biological Consultant

Attachments: Table 1. Flora and Fauna Detected – The West Lilac I & II Tentative Map, TM 5276
Table 2. Impact/Mitigation Table - The West Lilac I & II Tentative Map, TM 5276
Attachment A. Vegetation Map and Proposed Open Space -TM 5276
Attachment B. Sensitive Species Known From Vicinity – West Lilac I & II Tentative Map

Table 1. Flora and Fauna Detected - The West Lilac I & II Tentative Map, TM 5276, Valley Center.

<u>Scientific Name</u>	<u>Common Name</u>
<i>Aesculus californica</i> *	California Buckeye
<i>Amaranthus albus</i> *	White Tumbleweed
<i>Anagallis arvensis</i> *	Scarlet Pimpernel
<i>Artemisia californica</i>	California Sagebrush
<i>Baccharis pilularis</i>	Coyote Brush
<i>Brachypodium distachyon</i> *	Purple False-brome
<i>Brassica geniculata</i> *	Perennial Mustard
<i>Bromus diandrus</i> *	Ripgut Brome
<i>Bromus mollis</i> *	Soft Brome
<i>Bromus rubens</i> *	Foxtail Brome
<i>Camissonia bistorta</i>	Southern Sun Cup
<i>Chamaesyce maculata</i> *	Spotted Spurge
<i>Chamaesyce</i> sp.	Spurge
<i>Chenopodium murale</i> *	Goosefoot
<i>Chloris</i> sp.*	Chloris
<i>Cirsium vulgare</i> *	Bull Thistle
<i>Citrus limon</i> *	Lemon
<i>Citrus sinensis</i> *	Orange
<i>Conyza canadensis</i> *	Common Horseweed
<i>Cortaderia</i> sp. *	Pampas Grass
<i>Cynodon dactylon</i> *	Bermuda Grass
<i>Cyperus</i> sp.	Sedge
<i>Epilobium</i> sp.	Fireweed
<i>Eremocarpus setigerus</i>	Dove Weed
<i>Erodium cicutarium</i> *	Red-stem Stork's-bill
<i>Eucalyptus globulus</i> *	Blue Gum
<i>Festuca megalura</i> *	Foxtail Fescue
<i>Foeniculum vulgare</i> *	Wild Anise
<i>Hedypnois cretica</i> *	Hedypnois
<i>Heliotropium curvassavicum</i>	Wild Heliotrope
<i>Heterotheca grandiflora</i> *	Telegraph Weed
<i>Lactuca serriola</i> *	Wild Lettuce
<i>Lantana</i> sp.*	Lantana
<i>Lotus scoparius</i>	Deer weed
<i>Lotus</i> sp.	Lotus
<i>Malosma laurina</i>	Laurel Sumac
<i>Malva parviflora</i> *	Cheeseweed
<i>Melilotus albus</i> *	White Sweet Clover
<i>Melilotus indicus</i> *	Indian Sweet Clover
<i>Melilotus</i> sp. *	Sweet Clover
<i>Opuntia ficus-indica</i> *	Indian Fig
<i>Panicum capillare</i> *	Western Witch Grass
<i>Persea americana</i> *	Avocado

Table 1. Flora and Fauna Detected - The West Lilac I & II Tentative Map, TM 5276, Valley Center.

<u>Scientific Name</u>	<u>Common Name</u>
<i>Picris echioides</i> *	Bristly Ox-tongue
<i>Polygonum arenastrum</i> *	Yard Knotweed
<i>Polypogon monspeliensis</i> *	Rabbitfoot Grass
<i>Quercus agrifolia</i>	Coast Live Oak
<i>Raphanus sativus</i> *	Wild Radish
<i>Rumex salicifolius</i>	California Dock
<i>Salix lasiolepis</i>	Arroyo Willow
<i>Salix</i> sp.	Willow
<i>Salsola pestifer</i> *	Russian Thistle
<i>Solanum americanum</i>	White Nightshade
<i>Sonchus oleraceus</i> *	Sow Thistle
<i>Stephanomeria virgata</i>	Stephanomeria
<u>Birds</u>	
<i>Archilochus anna</i>	Anna's Hummingbird
<i>Archilochus</i> sp.	Hummingbird
<i>Carpodacus mexicanus</i>	Housefinch
<i>Cathartes aura</i>	Turkey Vulture
<i>Pipilo crissalis</i>	California Towhee
<i>Sayornis nigricans</i>	Black Phoebe
<i>Zenaida macroura</i>	Mourning Dove
<u>Mammals</u>	
<i>Spermophilus beecheyi</i>	California Ground Squirrel
<i>Thomomys bottae</i>	Valley Pocket Gopher
<u>Reptiles</u>	
<i>Uta stansburiana</i>	Side-blotched Lizard
<u>Insects</u>	
<i>Papilio rutulus</i>	Western Tiger Swallowtail
<i>Pontia protodice</i>	Common White

* Denotes non-native species

Table 2. Impact/Mitigation Analysis - The West Lilac I & II Tentative Map, TM 5276, Valley Center

<u>Habitat Type</u>	<u>Existing Acreage</u>	<u>Acreage Impacted</u>	<u>Acreage Preserved</u>
Urban/Developed	Offsite	n/a	n/a
Southern Coast Live Oak Riparian Forest	0.22 acres	none	0.22 acres in open space
Disturbed Wetland	1.85 acres	none	1.85 acres in open space
Orchards and Vineyards	76.00 acres	76.00 acres	n/a
Non-native Grassland	14.71 acres	13.39 acres	6.70 acres offsite ¹

¹ Within a County-approved Mitigation Bank or other County-approved location

Attachment A. Vegetation Map and Proposed Open Space Exhibit:
The West Lilac Farms I & II Project, TM 5276, Valley Center

(100'-scale project map, attached)

Attachment B. Sensitive Species known from the Vicinity:
The West Lilac Farms I & II Project, TM 5276, Valley Center

Latin	Common	Federally Endangered	Federally Threatened	State Endangered	State Threatened	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Probability of Occurrence
<i>Adolphia californica</i>	San Diego adolphia					X		X															L
<i>Brodiaea orcuttii</i>	Orcutt's brodiaea							X	X	X	X								X				L
<i>Clarkia delicata</i>	Campo clarkia									X													L
<i>Harpagonella palmeri</i>	Palmer's grappling hook					X	X			X													L
<i>Ophioglossum californicum</i>	California adder's tongue fern						X	X											X				L
<i>Piperia cooperi</i>	Cooper's rein orchard					X	X	X		X	X	X								X	X		L
<i>Pipera liptopetala</i>	Narrow-petaled rein orchard					X	X	X		X	X	X								X	X		L
<i>Quercus engelmannii</i>	Engelmann oak								X	X													L
<i>Danaus plexippus</i>	Monarch butterfly							X		X										X			M
<i>Bufo microscaphus californicus</i>	Arroyo toad	X				X	X	X	X	X	X									X			L
<i>Rana aurora draytoni</i>	California red -legged frog		X						X						X					X		X	L
<i>Coleonyx variegatus abbottii</i>	San Diego banded gecko					X		X			X												L
<i>Phrynosoma coronatum blainvillei</i>	San Diego horned lizard					X	X	X	X		X	X											L
<i>Cnemidophorus hyperythrus</i>	Orange-throated whiptail					X	X	X	X		X												L
<i>Cnemidophorus tigris multiscutatus</i>	Coastal western whiptail						X		X	X	X												M
<i>Anniella pulchra pulchra</i>	Silvery legless lizard					X		X	X												X		M
<i>Charina trivirgata roseofusca</i>	Coastal rosy boa					X	X			X	X												L
<i>Diadophis punctatus similis</i>	San Diego ringneck snake					X	X		X	X	X	X	X										M
<i>Thamnophis sirtalis ssp. Novum</i>	South Coast garter snake								X						X								L
<i>Thamnophis hammondi</i>	Two stripe garter snake								X						X								M
<i>Myotis yumanensis</i>	Yuma myotis					X	X	X	X	X	X	X	X	X	X		X	X	X	X		X	M
<i>Myotis ciliolabrum</i>	Small-footed myotis						X		X	X	X	X	X	X		X			X				M
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat						X	X	X	X	X	X	X	X		X	X		X				M
<i>Antrozous pallidus</i>	Pallid bat					X	X	X	X	X	X	X	X	X		X	X		X				M
<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	M
<i>Nyctinomops macrotis</i>	Big free-tailed bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	M
<i>Eumops perotis californicus</i>	Greater western mastiff bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	M
<i>Lasiurus blossevillei</i>	Western red bat								X	X		X	X						X				M
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit					X	X	X		X	X	X	X										M
<i>Chaetodipus californicus femoralis</i>	Dulzura California pocket mouse					X	X	X		X	X	X											M
<i>Dipodomys stephensi</i>	Stephen's kangaroo rat	X			X	X		X															L
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat					X			X	X	X												L
<i>Onychomys torridus ramona</i>	Southern grasshopper mouse					X	X	X			X												L
<i>Taxidea taxus</i>	American badger					X	X	X		X	X	X		X		X	X			X			L
<i>Odocoileus hemionus</i>	Southern mule deer					X	X	X	X	X	X	X	X	X		X	X			X			L
<i>Accipiter cooperi</i>	Cooper's hawk							X	X	X													L
<i>Accipiter striatus</i>	Sharp-shinned hawk					X				X		X											M
<i>Ammodramus savannarum</i>	Grasshopper sparrow							X															M
<i>Aquila chrysaetos</i>	Golden eagle					X	X	X		X	X	X	X	X									L
<i>Ardea herodias</i>	Great blue heron							X							X							X	M

Attachment B. Sensitive Species known from the Vicinity:
The West Lilac Farms I & II Project, TM 5276, Valley Center

Latin	Common	Federally Endangered	Federally Threatened	State Endangered	State Threatened	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Probability of Occurrence
<i>Buteo lineatus</i>	Red-shouldered hawk								X	X													M
<i>Cathartes aura</i>	Turkey vulture					X	X	X	X	X	X	X	X										O
<i>Elanus caeruleus</i>	Black-shouldered kite							X	X														M
<i>Empidonax trailii extimus</i>	Southwestern willow flycatcher	X							X														L
<i>Eremophila alpestris actis</i>	Horned lark							X												X			M
<i>Ictera virens</i>	Yellow-breasted chat								X														M
<i>Lanius ludovicianus</i>	Loggerhead shrike					X		X	X	X						X	X						M
<i>Sialia mexicana</i>	Western bluebird								X	X													M
<i>Tyto alba</i>	Common barn-owl								X	X													M
<i>Vireo bellii pusillus</i>	Least Bell's vireo	X		X					X														L

PROBABILTY OF OCCURRENCE CODES:

L – Low Probability; rare species in area, and no significant habitat (animals), *or* distinctive perennial that would not have been missed if present onsite (plants). Most of these species occur on habitat not found on the TM 5276 site, including vernal pools, native grasslands, mafic soils, etc. Campo Clarkia and Least Bell's Vireo are two examples of species that fit into this category. Both are very rare in San Diego County.

M – Moderate Probability; could be expected to occur onsite on at least an occasional basis, based on habitat quality (animals), *or* could occur onsite, but rare, and/or poorly known (plants). Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the TM 5276 property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite.

H – High Probability; certain to occur onsite on a regular basis (animals), but cryptic, *or* ephemeral species known from the immediate vicinity, but seasonal in occurrence (plants). Most of these species are expected to use the site, but are difficult to reliably detect. Examples include various fossorial reptiles, wide-ranging species, etc.

O – Observed; see text for discussion.